

KING L. WU & ASSOCIATES
ATTORNEYS AT LAW

December 16, 2019

VIA ECF

Hon. Jesse M. Furman
United States Courthouse
40 Foley Square
New York, NY 10007
Courtroom 1105

Re: *Yu et al v. Diguojiaoyu, Inc. et al* (1:18-cv-07303)

Hon. Judge Furman,

As your honor is fully aware, Defendants' Counsel has failed to show cause on December 13, 2019. Defendants' Counsel first ignored the Order dated November 20, 2019 (ECF Doc. 64) to complete Plaintiff's discovery requests and proceeded to ignore warnings for striking Defendants' Answer and entry of default judgment. Defendants and Defendants' Counsel has demonstrated **zero** effort in continuing their defense for this case, and have failed to act on several occasions.

Plaintiff's Counsel could not agree more with your honor's statement that the previous extensions and notices have been more than gracious given. Plaintiff's Counsel do not see the need for further extensions for Defendants and their counsel since the result of such extension is very predictable. Plaintiff's counsel further asserts that the Court's excessive leniency has gradually created a prejudicial effect against Plaintiffs.

At this point, Plaintiff's Counsel seeks the court's instructions on how to proceed with this case – whether a motion to default should be filed, or would such motion just be another unnecessary expense for the Plaintiffs since the motion would more than likely be unopposed and prolong the result of this case. Therefore, Plaintiff's Counsel kindly requests for an Order of Default Judgment against Defendants, including sanctions against Defendant and Defendants' Counsel with payment due dates, or instructions on how to proceed. Thank you for your time and attention in this matter.

Respectfully submitted,

/s/ King Lun Wu

King L. Wu & Associates, P.C.
Attorney for Plaintiffs